

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:22-cv-24066-KMM

GRACE, INC., et al.,  
Plaintiffs,  
vs.  
CITY OF MIAMI,  
Defendant.

## DEPOSITION OF

YANELIS VALDES

Wednesday, October 4th, 2023  
1:05 p.m. to 3:40 p.m.  
333 Southeast 2nd Avenue  
Suite 3200  
Miami, Florida 33131

Taken on behalf of the Defendant before  
Mayra Texeira, Shorthand Reporter and Notary Public  
in and for the State of Florida at Large, pursuant  
to Notice of Taking Deposition in the above cause.

Page 2

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2  
3 APPEARANCES  
4  
5

6 On behalf of the Plaintiffs:  
7  
8

9 American Civil Liberties Union Foundation  
10 336 East College Avenue  
11 Suite 203  
12 Tallahassee, Florida 32301  
13 BY: DANIEL TILLEY, ESQUIRE  
14 BY: NICHOLAS WARREN, ESQUIRE  
15

16 On behalf of the Defendant:  
17  
18

19 GRAY|ROBINSON, P.A.  
20 333 Southeast 2nd Avenue  
21 Suite 3200  
22 Miami, Florida 33131  
23 BY: GEORGE LEVESQUE, ESQUIRE  
24  
25

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14 I N D E X  
15  
16

Witness	Direct	Cross
Yanelis Valdes	4,68	67

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1 Thereupon:

2 YANELIS VALDES

3 was called as a witness and, having been first duly  
4 sworn, was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. LEVESQUE:

7 Q. Good afternoon, Ms. Valdes. We met  
8 previously. My name is Jorge Levesque. I'm  
9 representing the City of Miami in this litigation  
10 and, as you know, you're an individual plaintiff.  
11 Before we get started, can you please state your  
12 full name for the record.

13 A. Yanelis Valdes.

14 Q. And do you have a middle name?

15 A. I do not.

16 Q. And can you spell that for the record?

17 A. Y-A-N-E-L-I-S, V-A-L-D-E-S.

18 Q. And what is your date of birth?

19 A. [REDACTED].

20 Q. What is your current residential address?

21 A. 58 Northeast 14th Street, Apartment 2812,  
22 Miami, Florida 33132.

23 Q. And how long have you lived at that  
24 address?

25 A. Two and a half years. About two and a half

1 years.

2 Q. And what was your address before that?

3 A. 1600 Northeast First Avenue, Apartment  
4 1504, Miami, Florida 33132.

5 Q. And how long did you live at that address?

6 A. About two years.

7 Q. Where did you live before that?

8 A. I lived in D.C. before that.

9 THE COURT REPORTER: I'm sorry?

10 A. In D.C. Washington, D.C.

11 Q. And prior to your time in D.C. did you  
12 ever live in Miami?

13 A. I lived in Miami-Dade County, in Hialeah.

14 Not in the city of Miami.

15 Q. And where did you live when you lived in  
16 Miami-Dade County?

17 A. In Hialeah. Do you need the address?

18 Q. Yes.

19 A. 7785 West 29th Way, Apartment 201,  
20 Hialeah, Florida 33018.

21 Q. How long did you live at that Hialeah  
22 address?

23 A. Eighteen years.

24 Q. Is that your parents' home?

25 A. Uh-huh.

1 Q. And for the 58 Northeast 14th Street  
2 address, what district is that in?

3 A. Right now it's in District 2.

4 Q. And prior to the 2022 cycle, so from 2013  
5 to 2022, what district was that in?

6 A. I believe it was District 2.

7 Q. And what type of documentation do you have  
8 that would demonstrate that you live at the  
9 58 Northeast 14th Street address?

10 A. I have a lease. I have my FP&L bill. And  
11 I have a water bill. And Internet as well.

12 Q. What address is on your driver's license?

13 A. The 1600 address.

14 Q. And what address is on your voter's  
15 registration?

16 A. I recently switched it so it should be now  
17 the 58 Northeast address.

18 Q. When did you switch it?

19 A. Sometime this week in anticipation of the  
20 election.

21 Q. If I can ask, when you moved to the  
22 58 Northeast 14th Street address, did you intend for  
23 that to be your new residence?

24 A. Yes.

25 Q. Is there a reason why you didn't update

1       your driver's license or your voter's registration  
2       at that time?

3           A.    No reason.

4           Q.    Have you ever voted in the city election?

5           A.    I have.

6           Q.    Which election did you vote for?

7           A.    I don't remember.

8           Q.    Have you ever been deposed before?

9           A.    I have not.

10          Q.    Have you ever testified in court before?

11          A.    No.

12          Q.    Do you understand that you're under oath?

13          A.    Yes.

14          Q.    And that you must answer the questions  
15        truthfully?

16          A.    Yes.

17          Q.    And do you understand that all the  
18        statements -- that all of our conversation is being  
19        taken down?

20          A.    Yes.

21          Q.    One of the things that I'll ask you to  
22        help me with is to help the court reporter. You're  
23        doing a great job now of answering yes or no.

24          Sometimes you're also shaking your head. Just if  
25        that ever becomes an answer I might prompt you and

1 say, is that a yes. I'm not meaning to be rude; I'm  
2 just meaning to make sure we get a good record.

3 You're doing a great job of speaking  
4 clearly. Sometimes I might speak fast. Sometimes I  
5 might mumble. If I do that and you don't understand  
6 my question, please ask me to repeat it and I'll do  
7 so. If for any reason you answer the question I'm  
8 going to assume that you understood the question and  
9 what I was asking. Is that fair?

10 A. Yes.

11 Q. Okay. This isn't intended to be a Spanish  
12 Inquisition or something like that. If you ever need  
13 a break for -- you know, to take a bathroom break or  
14 for any reason just let me know. The one thing I  
15 would ask, if we have a question pending go ahead  
16 and answer the question and then take a break. Is  
17 that fair?

18 A. Yes.

19 Q. What did you do to prepare for this  
20 deposition?

21 A. I reviewed the -- like media coverage. So  
22 some of the articles. And the statements that I've  
23 made previously. I also rewatched what I said in the  
24 special meeting that happened in February of last  
25 year.

1 Q. Did you watch the meeting that occurred in  
2 June of this year?

3 A. I didn't watch the meeting, but I did read  
4 my statement.

5 Q. And other than your attorneys, did you  
6 discuss your deposition with anyone?

7 A. No. I mentioned that it was happening, but  
8 not -- but not the details.

9 Q. Are you presently married?

10 A. No.

11 Q. Have you ever been married before?

12 A. No.

13 Q. What is your current employment?

14 A. I am the director of organizing and  
15 advocacy for Engage Miami.

16 Q. And how long have you been in that  
17 position?

18 A. Two years.

19 Q. And how did you come into that position?

20 A. I was first a member of Engage Miami in  
21 2019 and I remained connected to the organization  
22 and I applied for a job for advocacy manager  
23 sometime in 2021 and then received a promotion to  
24 this current role in the summer of 2021.

25 Q. So when you were originally hired you were

1 hired as the advocacy manager?

2 A. Yes.

3 Q. And then now you're the director of  
4 organization and advocacy?

5 A. Yes.

6 Q. What are your responsibilities as a  
7 director of organization and advocacy?

8           A.     I manage our organizers. I help with our  
9 membership model. So we are membership based. So I  
10 help guide what that looks like. I plan community  
11 meetings. I help people be connected to local civic  
12 participation. Those are some of the  
13 responsibilities that I have.

14 Q. What does it take to become a member of  
15 Engage Miami?

16                   A. So we have a few different ways, but I'll  
17 talk about one of the main ways and that's through  
18 our community meetings. Folks come out, they have  
19 the opportunity to fill out what we call a  
20 membership commitment form expressing their interest  
21 in becoming a member. They pay into a member fund if  
22 they have the means to do so. And they have  
23 follow-up conversations with our organizers and are  
24 able to participate in different membership only  
25 activities that we have. Which vary. That's one way

1 to get involved as a member.

2 Q. What are some of the other ways?

3 A. Another way is by connecting with one of  
4 our organizers outside of the community meetings and  
5 still filling out the membership commitment form. So  
6 the key of us considering somebody as a member is if  
7 they filled out the membership commitment form.

8 Q. Now, is anybody who completes a membership  
9 form automatically -- and that's provided to you, do  
10 they automatically become a member or is there some  
11 overview process?

12 A. They become a member and we speak with  
13 them; we reach out. And we consider folks  
14 organizing members who are more involved, who come  
15 out to one or two meetings in the year.

16 Q. And in terms of maintaining a membership  
17 list, does Engage Miami maintain a membership list?

18 A. Yes.

19 Q. And about how many of those members  
20 currently reside within the city of Miami?

21 A. Between 40 and 50 people.

22 Q. Have you looked at your membership list  
23 and the addresses -- let me back up.

24 Does your membership form ask for the  
25 address of the member?

1 A. Yes.

2 Q. And have you looked at your membership  
3 addresses to assess where your membership lives in  
4 each district within the city?

5 A. I have not recently looked to see if each  
6 member lives in each district.

7 Q. Have you ever done that?

8 A. I don't remember.

9 Q. Do you know if anybody in Engage Miami,  
10 other than you, has done that?

11 A. Potentially, but I'm not sure.

12 Q. Are you familiar with the Engage Miami  
13 Civic Foundation?

14 A. Yes.

15 Q. What is that?

16 A. That is our 501(c)3 organization.

17 Q. And what's the purpose of that  
18 organization?

19 A. I'm not sure that I'm the right person to  
20 answer that.

21 Q. Do you have any affiliations with that  
22 organization?

23 A. Yes.

24 Q. What's your affiliation with that  
25 organization?

1 A. I'm employed by the organization.

2 Q. Are you also employed by Engage Miami?

3 A. Yes.

4 Q. So you've got two employers there?

5 A. I'm not sure the, like, back end of it.

6 So I don't think that I can really respond to the  
7 way that's structured.

8 Q. In terms of the name of the employer on  
9 your paycheck or on your W-2, do you know who that  
10 is?

11 A. I don't remember.

12 Q. Have you ever been registered to vote  
13 under a different name?

14 A. No. There was a discrepancy when I first  
15 ever registered to vote and my last name was spelled  
16 incorrectly at one point, but no other name  
17 purposely.

18 Q. And how did you get that resolved?

19 A. When I updated my voter's registration  
20 when I moved back to the city of Miami.

21 Q. I'm going to show you a document and we're  
22 going to mark this as Defendant's Exhibit 23. I'll  
23 give you a second to look at that document.

24 Do you recognize that document?

25 A. I believe so.

1 Q. And what do you recognize that document  
2 is?

3 A. What we filed within the City of Miami for  
4 racially gerrymandering during our redistricting  
5 process for our district maps.

6 Q. Did you review that document or a draft of  
7 that document before it was filed?

8 A. I don't remember.

9 (Defendant's Exhibit 23, Complaint, was  
10 marked for Identification.)

11 Q. And when you say you don't remember, does  
12 that mean you might have or you might not have?

13 A. Yes. I might have and I might not have.

14 Q. Okay. Do you recall if you approved this  
15 document before it was filed?

16 A. I don't remember.

17 Q. Other than your attorney, have you ever  
18 discussed this document with anyone?

19 A. No.

20 Q. Okay. If I could ask you to flip to  
21 page 6. In paragraph 29, it says, plaintiff, your  
22 name, is a Latina Cuban-American resident of  
23 Omni/Downtown and District 5.

24 Is Omni/Downtown the neighborhood that you  
25 live in?

1 A. Yes.

2 Q. And that is where the address of 58  
3 Northeast 14th Street address is?

4 A. Yes.

5 Q. And in the complaint it asserts that  
6 you're a Latina Cuban-American resident. For you,  
7 what does it mean to be a Latina?

8 A. It's a really broad question. I'm not  
9 sure.

10 Q. Well, let me ask this. Is it different  
11 than being Hispanic?

12 A. Yes. I would say so.

13 Q. And how is it different?

14 A. From like a semantics point, it means  
15 coming from Latin America versus from a  
16 Spanish-speaking territory with like Spanish  
17 Colonial influence. That's what I would say is the  
18 main. And Latina I would say is just a more modern  
19 way to refer to my identity.

20 Q. And you also identify as Cuban-American.  
21 Can you explain what that is -- or what you mean by  
22 Cuban-American?

23 A. Sure. My parents are both Cuban, my mom  
24 was born on the island, and I was raised in a large  
25 Cuban family. But I was born here in the United

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1 States. So I consider myself Cuban-American.

2 Q. In paragraph 30 it asserts that the  
3 enacted plan, and the plan that we're talking about,  
4 that is the 2022 plan, places you in districts where  
5 you are not the predominant racial group.

6 What is the predominant racial group in  
7 District 5?

8 A. African-American.

9 Q. And what is your objection to being placed  
10 in District 5?

11 A. I would say that it's because of the way  
12 that neighborhoods are -- my neighborhood in  
13 particular is grouped in a way that is not really  
14 taking into account the makeup of our -- the  
15 community members in that particular area and so --  
16 yeah. It feels like being in a district where my  
17 community isn't the predominantly -- the predominant  
18 racial community there could dilute the  
19 representation that I could have in my district.

20 Q. So if I can paraphrase, and if I'm getting  
21 this wrong please let me know. So you as a Latina,  
22 if you're placed in a Black district, you feel your  
23 voice would be diluted. Is that accurate?

24 A. Potentially.

25 Q. And do you identify the Omni/Downtown area

1 as your neighborhood?

2 A. Yes.

3 Q. How do you define a neighborhood?

4 A. Geographic and kind of a place based on  
5 boundaries, like local businesses and places that  
6 are recognizable and have folks from the community  
7 gathering. Some other housing structures as well.  
8 Those are some of the things I would say make up a  
9 neighborhood.

10 Q. And in terms of the racial composition of  
11 your neighborhood, how would you describe it?

12 A. I would describe it primarily Hispanic,  
13 Latina.

14 Q. If I could ask you to look at paragraph  
15 32. In that paragraph it alleges that the individual  
16 plaintiffs, which would include you, are further  
17 harmed because the enacted plan splits up their  
18 neighborhoods and the neighborhoods are split along  
19 racial lines.

20 Are you aware if whether the 2002 enacted  
21 plan splits your neighborhood?

22 A. You mean the 2022?

23 Q. Yeah. The 2022 map.

24 A. I don't remember exactly how it was split  
25 in the 2022 map. I know that I was moved into a

1 different district.

2 Q. Is your primary concern with the 2022 map  
3 that you were moved into another district?

4 A. I would say that's a concern, but not the  
5 only concern.

6 Q. What other concerns do you have of the  
7 2022 map?

8 A. I would say in general as a whole the city  
9 of Miami was drawn in a way that felt like it wasn't  
10 representative of like the neighborhood and  
11 geographic areas that represented communities and  
12 instead were drawn based on race.

13 Q. Are there other concerns?

14 A. Yeah. There are other concerns about the  
15 way the map was drawn and the representation around  
16 community and -- the ways the people are represented  
17 in the city.

18 Q. When you say the ways in which they are  
19 represented, how do you mean that?

20 A. Yeah. So the map was drawn to seemingly  
21 put Black residents into one district and Hispanic  
22 residents into other districts. And so communities  
23 were split up and neighborhoods were broken up and  
24 it wasn't from a perspective of like boundaries that  
25 are naturally occurring, but based on people's race.

1           Q. Now, in your instance you were a Hispanic  
2           that was drawn into a Black district. If I  
3           understand what you are just saying correctly, you  
4           would have preferred to have been included in a  
5           Hispanic district. Is that a fair characterization?

6           A. I'm not sure that I would say that. For me  
7           a big concern is the full picture of the whole map.  
8           For me the community as a whole is really important.  
9           And so I'm thinking about other folks in my  
10           neighborhood that are in -- have been moved to other  
11           parts. Like it's a couple blocks away in a different  
12           district. So for me it's more about as a whole.  
13           I've seen the city being drawn in a way that was  
14           based on race.

15           Q. And I want to kind of differentiate  
16           between the map as a whole and your district. Let's  
17           talk about just your district right now. Or your  
18           district as it was drawn when you were in  
19           District 5.

20           A. Uh-huh.

21           Q. And what I'll call the movement from  
22           District 2. In that regard, is your chief complaint  
23           that you were a Hispanic resident that was being  
24           moved into a Black district?

25           A. I'm not sure how to answer that.

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1           Q.    Do you feel you were placed in that  
2           district just because you were Hispanic?

3           A.    I'm not sure.

4           Q.    You can set that aside. Ms. Valdes, I'm  
5           going to show you another document that we are going  
6           to mark DE 109. And I'll represent to you that this  
7           is a supplemental complaint that was filed in the  
8           litigation.

9                   Do you recognize this document?

10          A.    I believe so.

11          Q.    Do you recall if you saw this document  
12           before it was filed on September 7th, 2023?

13          A.    I don't recall.

14                   (Defendant's Exhibit 109, Supplemental  
15           Complaint, was marked for Identification.)

16          Q.    Do you recall if you approved this  
17           document before it was filed?

18          A.    I don't recall.

19          Q.    Have you ever discussed this document with  
20           anyone?

21          A.    No.

22          Q.    Okay. If we could go ahead and flip to  
23           page 3. And I'll draw your attention to  
24           paragraph 15. And that asserts that plaintiff is  
25           Latina and Cuban-American, was a resident of

1       District 5 under the 2022 plan, and is a resident of  
2       District 2 under the 2023 plan.

3                   Do you agree with that statement as it  
4       applies to you?

5                   A.    Yes.

6                   Q.    Then on the following paragraph it says,  
7       the 2023 plan placed plaintiffs Cooper, Johnson, and  
8       Valdes and organizational plaintiffs' members in  
9       districts where they are not the predominant racial  
10      group.

11                  Now, under that 2023 plan you were placed  
12      in District 2. What is the predominant racial group  
13      in District 2?

14                  A.    White, Anglo. Non-Hispanic White.

15                  Q.    And when you say -- when I say predominant  
16      racial group, how are you interpreting that?

17                  A.    The majority of folks that make up that  
18      community are from that race. Yeah. The majority of  
19      people who live in that district are of this race.

20                  Q.    Do you know what percentage of District 2  
21      is white?

22                  A.    No. Not off the top of my head.

23                  Q.    Have you looked at any of the racial  
24      statistics for any of the districts in the 2022  
25      plan?

1 A. Yes.

2 Q. Have you looked at any of the  
3 statistics -- the racial statistics for the 2023  
4 plan?

5 A. Yes.

6 Q. And when I say the 2022 plan and the 2023  
7 plan, you understand which plans I'm referencing?

8 A. Yes.

9 Q. Have you looked at any of the racial  
10 statistics for the plans that have been submitted on  
11 your behalf as a plaintiff?

12 A. Yes.

13 Q. I'm going to show you a document that  
14 we're going to mark DE 82-12. And I'll represent to  
15 you that this is an appendix that provides racial  
16 statistics for some of the plans that have been  
17 considered by the city commission and have been  
18 presented in this litigation. Looking at page 1, the  
19 enjoined plan in District 2, and looking across the  
20 columns, can you tell me which racial population has  
21 the highest percentage of District 2?

22 A. Can you explain the headers?

23 Q. Yes, I can. Starting with the first  
24 column, do you understand that district refers to 1,  
25 2, 3, 4, 5, each individual district?

1 A. Yes.

2 (Defendant's Exhibit 82-12, Chart, was  
3 marked for Identification.)

4 Q. And then you've got a total population  
5 column?

6 A. Yes.

7 Q. A population deviation column?

8 A. Yes.

9 Q. A percentage of population deviation  
10 column?

11 A. Yes.

12 Q. And then from there you get into white  
13 voting age population, Hispanic voting age  
14 population, Black voting age population, and then  
15 white citizen voting age population, Hispanic  
16 citizen voting age population, and Black citizen  
17 voting age population.

18 With that understanding, can you tell me  
19 which race or ethnicity is the highest in  
20 District 2?

21 A. Voting age population or --

22 Q. Yeah. We'll go with voting age population.

23 A. Yeah. It seems like Hispanic is the  
24 highest there.

25 Q. And that's true in -- that's also true of

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1 citizen voting age population too as well, isn't it?

2 A. Yes.

3 Q. Now I'm going to ask you to refer to the  
4 next page, which is labeled 15 at the bottom. And I  
5 will represent to you that the Resolution 23-271 box  
6 at the very bottom refers to the 2023 plan that  
7 we've been discussing. In that plan, what race or  
8 ethnicity makes up the largest share of District 2?

9 A. The same, Hispanic.

10 Q. And currently you live in District 2.  
11 Correct?

12 A. Yes.

13 Q. And who is your commissioner?

14 A. Right now it's Sabina Covo.

15 Q. Do you have a problem as a Latina being  
16 represented by another Latina?

17 A. I do not.

18 Q. And, in fact, that's what you would prefer  
19 for your district. Correct?

20 A. I'm not sure that I would say that that's  
21 what I prefer.

22 Q. Let me frame it this way, then. Do you  
23 have a criticism of how you have been drawn into  
24 your district?

25 A. I'm not sure how to answer that, to be

1 honest.

2 Q. What is your understanding of how you were  
3 treated under the plaintiffs' plans? Do you recall  
4 for plaintiffs' plan 1 whether you were in  
5 District 2 or District 5 or some other district?

6 A. I don't remember.

7 Q. What about for plaintiffs' plan 2?

8 A. I don't remember.

9 Q. Is that true of all the plaintiffs' plans?

10 A. Probably.

11 Q. Okay. You can set that document aside, but  
12 we may come back to it.

13 Have you ever lived at 2151 Southwest  
14 137th Place?

15 A. No.

16 Q. Ms. Valdes, I'm going to show you another  
17 document. We're going to mark this document as  
18 DE 24-83. And I'll represent to you that this is  
19 the 2022 enacted plan.

20 Have you seen this document before?

21 A. I've seen this map. I'm not sure if it's  
22 the exact document, but --

23 Q. Now, I understand it's a map of a somewhat  
24 large city, but are you able to identify  
25 approximately where you would reside in that map?

1 A. Yes.

2 (Defendant's Exhibit 24-83, Map, was  
3 marked for Identification.)

4 Q. Okay. If I could hand you a pen and ask  
5 you to place a dot.

6 A. (Indicating.)

7 Q. And then -- I know you probably made a  
8 small dot. If you could just draw an arrow or a  
9 circle to make it easier for --

10 A. (Indicating.)

11 Q. So you are right there on the edge.

12 A. Yeah.

13 Q. Now, we've already talked a little bit  
14 about your district. What is it about this map  
15 broadly, because you indicated that you had some  
16 broad concerns -- what is it about this map broadly  
17 that you have concerns with?

18 A. Can I take a look at this as well while  
19 I'm looking at this or --

20 Q. Sure.

21 A. Does enjoined and enacted mean the same  
22 thing?

23 Q. Well, they don't mean the same thing;  
24 they're referring to the same map.

25 A. Okay.

1 Q. And normally I wouldn't answer questions,  
2 but --

3 A. Yeah. I would say some of the things that  
4 are of concern to me are the way in which Black  
5 residents are really concentrated in one area -- in  
6 one district specifically as well as Hispanic voters  
7 really being represented and -- sort of more  
8 exclusively to 1, 3, and 4. And although District 2  
9 has a high Hispanic voting age population in  
10 comparison to white from the standpoint of, like,  
11 the proportional -- the proportional makeup of the  
12 city of Miami, it doesn't seem quite representative.

13 There is also the -- the ways in which  
14 some of this is drawn breaks up neighborhoods, not  
15 by, like, natural boundaries. And I don't know the  
16 specifics of the racial makeup in each of the small  
17 slivers, but those are some of the concerns.

18 Q. We'll work our way backwards there. So you  
19 mentioned neighborhoods being broken up, not -- and  
20 the districts not being drawn by natural boundaries.  
21 What's a natural boundary to you?

22 A. It means like a highway or a river. Those  
23 are examples.

24 Q. And looking at the map, what would be an  
25 area where the map isn't following a natural

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1 boundary that you think is problematic?

2 A. I would say the Natoma Manors kind of  
3 splits down into -- from Coconut Grove, but it's in  
4 a different district than full Coconut Grove.

5 Also -- and I can say like another example is this  
6 sliver in District 2 that goes into District 5. I'm  
7 not sure again what the makeup of that area is  
8 exactly, but those are some that stand out. As well  
9 as District 4 going into Coconut Grove and I don't  
10 know if that's a highway here, but there is like  
11 that sliver.

12 Q. For that last portion, are you talking  
13 about the little triangle piece that comes off right  
14 above the words Coconut Grove?

15 A. Yes.

16 Q. Now, you mentioned Natoma Manors with a  
17 little foot in District 3. Do you have any  
18 understanding of why that was done?

19 A. Not that I recall.

20 Q. Do you recall any news articles about  
21 Commissioner Carollo's house being in that area?

22 A. I do remember articles about it. Yes.

23 Q. At the time this map was drawn in 2022, do  
24 you think it would have been improper for a  
25 commissioner to draw his house into his district?

1           A.     If it wasn't the house he was living in or  
2     if it was currently in a different district, I would  
3     say yes.

4 Q. What would be improper about it?

5           A.     The fact that it's already sitting outside  
6 of a district at the time that they're a sitting  
7 commissioner. But I think it depends on the  
8 specifics of it.

9           Q.     But you would agree that probably has  
10           nothing to do with race. Right?

11 A. I'm not sure.

12 Q. What aren't you sure about?

13           A.    That I think there could be a -- it could  
14           be like multifaceted, the reason. So I'm not sure.

15 Q. Okay. Assume with me that it was drawn  
16 that way just for race -- I'm sorry. Not just for  
17 race; just to include his house in the district. You  
18 would agree that the inclusion of someone's house in  
19 a district is not a race-based reason. Correct?

20 A. Correct.

21 Q. Ms. Valdes, I'm going to show you another  
22 document that we are going to mark as DE 82-24. And  
23 I'll represent to you that this is the 2023 plan  
24 we've been talking about.

25 Have you seen this map before?

1 A. Yes.

2 (Defendant's Exhibit 82-24, Map, was  
3 marked for Identification.)

4 Q. And if I could ask you to go ahead and  
5 mark if you can roughly where your house is and  
6 circle it in that map.

7 A. (Indicating.)

8 Q. Now, in this map, is your neighborhood  
9 split?

10 A. I'm not sure.

11 Q. In this map, and I want to talk about your  
12 district first, what would your objection to this  
13 district be?

14 A. I think more of the district is split up  
15 towards the bottom.

16 Q. And when you say that it was split up  
17 towards the bottom, can you describe that for the  
18 record?

19 A. Yeah. In the area that's bordering  
20 District 3 and District 2 that goes into like  
21 past -- I don't know if this is like US-1 or one of  
22 the -- I think it's I-95. It goes more into Coconut  
23 Grove.

24 Q. Let me ask this. In terms of the line that  
25 it is following, do you know if that's a major

1 roadway or not?

2 A. I think so. Oh, the one that is in  
3 there -- that is actually drawn in there now?

4 Q. Yes.

5 A. I'm not sure.

6 Q. Do you have any knowledge of the  
7 neighborhood that would make up a broad area of what  
8 I will refer to as the Grove there in southeastern  
9 Miami?

10 A. I know some of them.

11 Q. Do you know if some of them are kept  
12 whole?

13 A. I'm not sure.

14 Q. And I might have asked this, but do you  
15 feel you were placed into District 2 because of your  
16 race?

17 A. I'm not sure. Maybe.

18 Q. I'm going to provide you another exhibit  
19 that we are going to mark DE 82-34. And I'll  
20 represent to you that this is plaintiffs' map 1 that  
21 was submitted to the city commission and ultimately  
22 to the Court. Do you recognize that map?

23 A. I do.

24 (Defendant's Exhibit 82-34, Map, was  
25 marked for Identification.)

1 Q. Do you know who drew this map?

2 A. Yes.

3 Q. Who drew this map?

4 A. The legal team with plaintiffs' input.

5 Q. Did you have input into this map?

6 A. Yes.

7 Q. In this map, what district are you in?

8 A. District 1.

9 Q. I'm going to ask you to mark that.

10 A. (Indicating.)

11 Q. Thank you. Now, in this map, are you aware  
12 of what the racial or ethnic makeup of District 1  
13 is?

14 A. I don't remember the specifics.

15 Q. Do you recall whether it was a Hispanic  
16 district or not?

17 A. I'm not sure.

18 Q. Did you discuss this map with anyone other  
19 than your attorneys?

20 A. No.

21 Q. Did you approve this map before it was  
22 submitted to the city?

23 A. I believe so. There was input so I would  
24 say yes.

25 Q. What were you trying to accomplish with

1 this map?

2 A. Neighborhoods kept whole not on the basis  
3 of race.

4 Q. Do you know if this map splits any  
5 neighborhoods?

6 A. I'm not sure.

7 Q. You would agree that sometimes  
8 neighborhoods have to be split for a variety of  
9 reasons in the districting?

10 A. Yes.

11 Q. And those reasons can be legitimate  
12 constitutional reasons. Correct?

13 A. Yes.

14 Q. Do you recall testifying that the maps  
15 that were submitted by plaintiffs didn't pack  
16 Hispanics?

17 A. What do you mean by testifying?

18 Q. I'm sorry. I'll be more precise in my  
19 question. Do you recall testifying at a June 14th  
20 meeting that the maps that were submitted by  
21 plaintiffs did not pack Hispanics?

22 A. Yes.

23 Q. And that would have applied to plaintiffs'  
24 maps 1, 2, and 3. Correct?

25 A. Yes.

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1 Q. If I could ask you to flip back to  
2 DE 82-12 and look at page 16. And for plaintiffs'  
3 map 1, in the first district, what is the Hispanic  
4 voting age population there?

5 A. 70. District 1?

6 Q. Yes.

7 A. 70.

8 Q. 70.1 percent?

9 A. 70.1.

10 Q. And it's got a Hispanic citizen voting age  
11 population of 66.3 percent. Correct?

12 A. Yes.

13 Q. Is that lower than the Hispanic voting age  
14 population for District 1 in all of the other plans?

15 MR. WARREN: Objection.

16 Q. I'll rephrase. Is that lower -- is the  
17 Hispanic -- strike that. Let me back up.

18 Is the Hispanic voting age population in  
19 plan 1 lower than the Hispanic voting age population  
20 in plaintiffs' maps 2, 3, and 4 for District 1?

21 A. Yes.

22 Q. In fact, it's about 15 to 16 points lower  
23 in those plans. Correct?

24 A. Yes.

25 Q. Is it your understanding that all of your

1 plans are constitutional?

2 A. I'm not a lawyer so --

3 Q. I'm just asking your understanding. Is it  
4 your belief that all of your plans that you drew  
5 were constitutional?

6 A. Yes.

7 Q. And when I say you drew, I mean --

8 A. Yes.

9 Q. -- broadly the plaintiffs.

10 A. Yes.

11 Q. Now, I want you to look at District 4 and  
12 the Hispanic voting age population for District 4 in  
13 plan 1. And it's 95 percent. Correct?

14 A. Yes.

15 Q. When you look at the 2022 enacted plan,  
16 are there any districts with a Hispanic voting age  
17 population that high?

18 A. Not at 95.

19 Q. Are there any Hispanic districts with a  
20 voting age population that is in the 90th  
21 percentile?

22 MR. WARREN: Object to form.

23 Q. Are there any Hispanic districts in the  
24 2022 plan that have a Hispanic voting age population  
25 higher than 90 percent?

1 A. Can you repeat that?

2 Q. For the 2022 plan that's labeled the  
3 enjoined plan on the appendix that we're looking at,  
4 are there any populations that are -- I'm sorry. Are  
5 there any Hispanic districts that have a population  
6 concentration greater than 90 percent?

7 A. No.

8 Q. And in every version of plaintiffs'  
9 plan -- strike that question.

10 I'm now going to show you an exhibit that  
11 we are going to mark as DE 82-35.

12 Do you recognize that as plaintiffs'  
13 map 2?

14 A. Yes.

15 (Defendant's Exhibit 82-35, Map, was  
16 marked for Identification.)

17 Q. Did you review this map before it was  
18 submitted to the city?

19 A. Yes.

20 Q. And did you review it before it was  
21 submitted to the Court?

22 A. Yes.

23 Q. And did you approve it?

24 A. Yes.

25 Q. Did you have input into it?

1 A. Yes.

2 Q. If I could ask you to mark --

3 A. (Indicating.)

4 Q. And you would agree that this plan is  
5 similar to plaintiffs' map 1. Correct?

6 A. Somewhat.

7 Q. What are the differences?

8 A. The eastern part of the city is in  
9 District 2 versus District 1. And District 3  
10 extends into Silver Bluff in map 2. And District 4  
11 comes down -- or sorry. Comes up in the second map.  
12 Those are some of the differences.

13 Q. Looking at this map, are you aware of  
14 whether neighborhoods are split?

15 A. Not that I recall.

16 Q. Do you know if Little Havana is split in  
17 this map?

18 A. I'm not sure.

19 Q. Let me ask you this: Do you know the  
20 boundaries for the Little Havana neighborhood?

21 A. Not off the top of my head, no.

22 Q. Have you ever looked at the boundaries for  
23 the Little Havana neighborhood?

24 A. At some point, yes.

25 Q. Was it related to this litigation?

1 A. Maybe.

2 Q. Do you recall how long ago it was that you  
3 looked at the boundaries for Little Havana?

4 A. No.

5 Q. I'm going to show you another document we  
6 are going to mark as DE 82-36.

7 Do you recognize that as plaintiffs'  
8 map 3?

9 A. Yes.

10 (Defendant's Exhibit 82-36, Map, was  
11 marked for Identification.)

12 Q. And as it relates to where you live, if  
13 you could mark that on that document.

14 A. (Indicating.)

15 Q. And in that map, which district do you  
16 live in?

17 A. I'm not sure.

18 Q. Did you see this map before it was  
19 submitted to the city and the Court?

20 A. Yes.

21 Q. Did you bother to try to figure out where  
22 you lived at the time?

23 A. I did.

24 Q. You don't recall if it's in District 5 or  
25 District 2?

1 A. I don't recall.

2 Q. And I understand lines are small so you  
3 can't really tell. If you lived in District 5 in  
4 this map, would that be a problem?

5 A. No.

6 Q. Is it your understanding that District 5  
7 in maps 1, 2, and 3 were drawn to elect a Black  
8 candidate?

9 A. I'm sorry. Can you repeat that?

10 Q. Is it your understanding that District 5  
11 in maps 1, 2 and 3 were drawn to elect a Black  
12 candidate?

13 A. I'm not sure what you're --

14 Q. Are you finished with your answer?

15 A. Yes.

16 Q. Do you have any understanding of whether  
17 the Voting Rights Act requires the city to draw a  
18 Black district?

19 A. Yes.

20 Q. When I say Black district, I mean a  
21 district that will elect the Black candidate of  
22 choice.

23 A. Yes.

24 Q. Is it your understanding that District 5,  
25 in all of these maps that we've just looked at, and

1 I'm referring only to plaintiffs' maps, is intended  
2 to be that VRA district?

3 A. Yes.

4 Q. Now, in plaintiffs' map 3, if you do  
5 reside in District 5, do you feel that you would --  
6 your representation would be diluted or that you  
7 would somehow not be as well represented if you're  
8 in District 5?

9 MR. WARREN: Object to form.

10 Q. Do you understand the question?

11 A. Can you repeat it one more time?

12 Q. Sure. If you do reside in District 5, do  
13 you feel your representation is somehow compromised  
14 as a result of a Latina being placed in a Black  
15 district?

16 A. I'm not sure.

17 Q. Okay.

18 MR. WARREN: It might be a good time  
19 for a break soon.

20 MR. LEVESQUE: Sure. Let me roll  
21 through map 4 if I could and then we'll  
22 take a break. That will allow me to  
23 regroup.

24 We're going to mark this next  
25 document as DE 82-37.

1 (Recess in proceedings.)

2 BY MR. LEVESQUE:

3 Q. Ms. Valdes, just before we were  
4 unceremoniously interrupted by the emergency alert,  
5 we were starting to look at plaintiffs' map 4.

6 Do you recognize that map?

7 A. Yes.

8 (Defendant's Exhibit 82-37, Map, was  
9 marked for Identification.)

10 Q. And did you review that map before it was  
11 submitted to the Court?

12 A. Yes.

13 Q. And was this map submitted to the city  
14 before it was submitted to the Court?

15 A. I don't remember.

16 Q. And do you know who drew this map?

17 A. Yes. The legal team with plaintiffs'  
18 input.

19 Q. And did your legal team draw all four of  
20 the maps that plaintiffs submitted?

21 A. Yes.

22 Q. And did you have input into all four of  
23 the maps?

24 A. Yes.

25 Q. If you could mark on there where you

1 believe your house might be.

2 A. (Indicating.)

3 Q. And was it your intention that this map  
4 should correct deficiencies that you found in the  
5 2023 enacted plan?

6 A. That's the one that the city drew this  
7 year?

8 Q. Yes. 2023.

9 A. I believe so.

10 Q. If I could ask you to pull out plaintiffs'  
11 map 4 and the 2023 enacted plan which is  
12 DE 82-24. And they are different maps. Correct?

13 A. Yes.

14 Q. They are not exactly the same?

15 A. No.

16 Q. But looking at District 5, District 5 is  
17 relatively similar. Would you agree?

18 A. They have differences.

19 Q. And I'm not trying to represent that they  
20 are exactly the same or there is only like one  
21 little nugget, but for the most part they follow  
22 I-95. I believe that is up through Wynwood that  
23 have somewhat similar borders. They both run up to  
24 the northern city boundaries?

25 MR. WARREN: Object to form.

1           A. I would say downtown is a shift and the  
2        end point of District 2 that would have been  
3        District 5 in -- or is District 5 -- wait. Sorry.  
4        Yeah. So District 2 extends more in the city's 2023  
5        map all the way up to Morningside where that is  
6        different in the plaintiffs' map. So they have some  
7        similarities, but they have differences as well. So  
8        relatively it's pretty subjective, but --

9           Q. So you would agree they both generally  
10      keep the neighborhood Wynwood in District 5?

11          A. Yes.

12          Q. They both keep Little Haiti in District 5?

13          A. Yes.

14          Q. Liberty City is also in District 5?

15          A. Yes.

16          Q. And Little River as well?

17          A. Yes.

18          Q. And they both retained the upper east  
19        side?

20          A. Yes.

21          Q. And I know there is some dispute over the  
22        boundaries of Overtown, but both of them have some  
23        portion, if not all of Overtown in their districts?

24          A. The plaintiffs' map 4 has all of Overtown.  
25        The city's 2023 map, I believe, has some parts of

1 Overtown split into the two districts.

2 Q. And when you say split into the two  
3 districts, which two districts is Overtown split  
4 between in the city plan?

5 A. In the city plan, I think -- I'm not  
6 totally sure, but between Districts 1 and 2, some  
7 small parts of it.

8 Q. Okay. So Overtown that is in District 5  
9 might be split between either 1 or 2 in that plan;  
10 you're just not sure?

11 A. Yeah. Yes.

12 Q. Do you know if plaintiffs' plan 4 splits  
13 any neighborhoods or communities of interest?

14 A. I'm not sure.

15 Q. I'm going to show you a document that  
16 we're going to mark as DE 82-2 and I'll represent to  
17 you that this is the June 14th, 2023 meeting  
18 transcript. And I'll represent to you also that this  
19 is not the entire transcript, just the excerpts that  
20 include your statement to the commission.

21 Have you had the opportunity to look at  
22 that document?

23 A. Yes.

24 (Defendant's Exhibit 82-2, Transcript Excerpt,  
25 was marked for Identification.)

1           Q. Does that appear to be your complete  
2 statement?

3           A. Yes.

4           Q. And drawing your attention to page 6,  
5 starting on line 13. In the first -- in that line it  
6 says, all the maps that we've submitted feature  
7 compact and logical districts that respect  
8 neighborhoods.

9                   Was it your testimony to the commission or  
10 your intent to convey to the commission that your  
11 maps did not split any neighborhoods?

12                  MR. WARREN: Object to form.

13                  A. I would say that it keeps neighborhoods  
14 whole in a way that's logical and -- yeah. I would  
15 say that. That is the intent.

16                  Q. And that it preserves genuine communities  
17 of interest.

18                   Was it your intention to convey to the  
19 commission that your maps preserved all of the  
20 communities of interest?

21                  A. I believe so.

22                  Q. I ask you to look at plaintiffs' map 1  
23 now. District 5 in that map does not include  
24 Overtown, does it?

25                  A. It does not.

1           Q. And District 5, as we discussed  
2 previously, was the plaintiffs' attempt to draw the  
3 VRA required Black district. Correct?

4           A. Yes.

5           Q. Now, does carving our -- and Overtown is a  
6 historically Black community. Correct?

7           A. Yes.

8           Q. Now, does carving out a historically Black  
9 community from the Black district respect  
10 communities of interest, in your opinion?

11          A. If Overtown is kept whole, yes.

12          Q. So if I understand, then, as long as you  
13 keep a community whole that should be okay?

14          A. I think it depends on specifics, but for  
15 the most part, yes.

16          Q. So placing a Black community in an  
17 overwhelmingly Hispanic district would be okay as  
18 long as they kept that Black community whole and  
19 placed in a Hispanic area even though there is a  
20 Black district that has been a part of since the  
21 district was originally drawn?

22           MR. WARREN: Object to form.

23          A. Can you repeat that one more time?

24          Q. Sure. I'll rephrase it. In your mind, it  
25 would be acceptable to remove a Black community from

1 a Black district as long as you kept that community  
2 whole. Is that fair?

3 MR. WARREN: Object to form.

4 A. Broadly I can't answer that, but I think  
5 in this case it makes sense to me.

6 Q. What about removing Overtown from  
7 District 5 makes sense to you from plaintiffs'  
8 map 1?

9 A. Geographically the neighboring areas have  
10 different similarities. Like Overtown neighboring  
11 Omni and downtown, I think there is sometimes  
12 like -- I would say because of gentrification that  
13 area has shifted and so -- yeah. I'm not sure  
14 exactly.

15 Q. When you were drawing District 1 and  
16 District 5 in this plan, were you intending to take  
17 into account gentrification?

18 MR. WARREN: Object to form.

19 Q. And I'll rephrase the question. When you  
20 approved this plan for submission to the city, were  
21 you intending to account for gentrification?

22 A. I don't remember. I'm not sure. I think  
23 there are similarities amongst communities included  
24 in this district. So that's one of the reasons I  
25 would say it made sense to me.

1           Q. When you say similarities included in this  
2 district, which district are you referring to?

3           A. District 1.

4           Q. So Overtown, in your opinion, had more  
5 similarities with District 1 than District 5 and  
6 that's why it made sense to put Overtown in  
7 District 1?

8                            MR. WARREN: Object to form.

9           A. I'm not sure.

10           Q. Well, in one map Overtown is in  
11 District 1. In plaintiffs' map 2, parts of Overtown  
12 are in District 1, parts of Overtown are in District  
13 5. And in map 3, parts of Overtown are in District  
14 5, parts of Overtown are in District 1. And then in  
15 plaintiffs' map 4, Overtown is in District 5 and  
16 none of it is in District 1.

17           A. Uh-huh.

18           Q. Would it be fair to say, with that  
19 variation, that Overtown could reasonably be placed  
20 in either District 1 or District 5?

21           A. Yes.

22           Q. And plaintiffs' map 4 was presented to the  
23 Court as their first choice of the maps that they  
24 presented. Correct?

25           A. Yes.

1           Q.    Do you have a problem with the fact that  
2    both the 2022 enacted plan and the 2023 enacted plan  
3    have one Black district and three majority Hispanic  
4    districts?

5                    MR. WARREN: Object to form.

6           A.    Do I have a problem with that?

7           Q.    I'll rephrase and maybe this might help.  
8    Do you have an objection to the fact that the two  
9    plans that were passed by the city, one in 2022, one  
10   in 2023, have three Hispanic districts and one Black  
11   district?

12                  MR. WARREN: Object to form.

13                  MR. LEVESQUE: What's the form  
14                    objection?

15                  MR. WARREN: I don't know what  
16                    Hispanic district is. I don't know what a  
17                    Black district is. I don't think those  
18                    terms have been defined.

19                  BY MR. LEVESQUE:

20                  Q.    When I say Hispanic district, do you  
21                    understand what I'm talking about?

22                  A.    I'm not sure if you mean like that --  
23                    there is a certain percentage of folks living in the  
24                    district or that the representative of the  
25                    district -- so --

1           Q.    That the district has a population that is  
2 reasonably calculated to elect the majority  
3 population candidate of choice. So with that  
4 understanding, are we on the same page?

5           A.    I think I understand. And I would say it's  
6 more complicated than that. Right? It's more about  
7 the ways in which -- the variation of what is the  
8 majority district. So I'm not sure how to answer  
9 that question, to be honest.

10          Q.    Are you aware of any way to draw a city  
11 districting map, after you draw a VRA required Black  
12 district, that doesn't have three districts that are  
13 likely to elect a Hispanic candidate?

14          A.    I'm not sure.

15          Q.    When you say you're not sure, you're not  
16 sure if you're aware or you're not sure if it's  
17 possible to do that?

18          A.    Right. I'm not sure if it's possible.

19          Q.    Now, in your statement to the city  
20 commission you say, they don't pack Hispanic voters  
21 into three specific districts and no longer  
22 designate one district as an Anglo access seat.

23                   What did you mean by that?

24          A.    I would say one example of that is the  
25 shift of Overtown in the first map that doesn't --

1 just because it's a Black neighborhood put it in  
2 District 5 although District 5 still is able to  
3 elect a Black representative. That's an example.

4 Q. Well, let me ask this: When you put  
5 Overtown into District 5, does that become packing  
6 District 5?

7 A. It depends on other boundaries, I would  
8 say. I'm not sure.

9 Q. Okay. And you're talking District 5 there.  
10 In your statement here you're referencing they  
11 don't -- the three maps that were presented, they  
12 don't pack Hispanic voters into three specific  
13 districts and no longer designate one district as an  
14 Anglo access seat. I'm asking -- that doesn't  
15 mention District 5. I'm asking what you meant by  
16 that statement.

17 A. As an example, there is more variation in  
18 District 1 with -- so in the enjoined plan the  
19 Hispanic voting age population is 89.5 whereas in  
20 the plaintiffs' maps they are all below that number,  
21 as an example.

22 Q. But you would agree that in all of the  
23 plaintiffs' plans District 4 has a 95 percent or  
24 higher Hispanic population. Correct?

25 A. Correct.

1           Q.    And so there's nothing improper about  
2       drawing a district at a lesser percentage than it  
3       should be?

4           A.    If that's not the intent.

5           Q.    Let's look at plaintiffs' maps 1 through 4  
6       for District 4. Unlike the 2022 plan and the 2023  
7       plan, all of them keep that western portion of the  
8       county -- I'm sorry; the city whole instead of  
9       splitting Flagami?

10          A.    In the plaintiffs' maps?

11          Q.    In the plaintiffs' maps.

12          A.    Yes.

13          Q.    Did you attend the city commission  
14       meetings when they were drawing the enjoined plan?

15          A.    The first plan?

16          Q.    The first plan.

17          A.    Yes.

18          Q.    Did you attend the city commission  
19       meetings when they were drawing the second plan in  
20       2023?

21          A.    In June?

22          Q.    In June.

23          A.    Yes. The one that I made this -- that I  
24       testified at?

25          Q.    Yes.

1 A. Yes.

2 Q. Did anybody stand up and request that  
3 Flagami be united in one district?

4 A. I don't recall.

5 Q. Do you know how long Flagami has been  
6 split between District 1 and District 4?

7 A. I do not.

8 Q. Would it surprise you if Flagami has been  
9 split in one way or another since the districts were  
10 originally drawn?

11 A. No. It wouldn't surprise me.

12 Q. And you certainly agree that in  
13 plaintiffs' maps and in the 2022 plan and the 2023  
14 plan, Districts 1, 2, and 4 all have super majority  
15 Hispanic populations. Correct?

16 MR. WARREN: Object to form.

17 A. Yeah. They're majority Hispanic.

18 Q. And they're not just majority Hispanic,  
19 they're super majority Hispanic.

20 A. Can you define super majority?

21 Q. One form of super majority is two-thirds.

22 A. Okay.

23 Q. That would be 66.6 percent, I believe, if  
24 my recollection of math is correct. So it's not  
25 improper to have three super majority Hispanic

1 districts when you're drawing a map. You drew four  
2 of them. Correct?

3 A. Yeah.

4 MR. WARREN: Object to form.

5 Q. You proposed four of them to the Court.  
6 Sorry. Can you answer that audibly?

7 A. Can you ask the full question again?

8 Q. It's not improper to draw three Hispanic  
9 districts for the city of Miami, is it?

10 MR. WARREN: Object to form.

11 A. No.

12 Q. Because you proposed in each of your maps  
13 three Hispanic districts. Correct?

14 A. Correct.

15 Q. And, in fact, in all of your plans  
16 District 4 is the highest populated Hispanic  
17 district of every plan considered or represented?

18 A. Yes.

19 Q. You reference an Anglo access district.  
20 What is an Anglo access district?

21 A. I'm not sure how I would define that, but  
22 it's something that came up quite often in the city  
23 commission meetings.

24 Q. Well, when you were speaking to the  
25 commission you said that your maps no longer

1 designate one district as an Anglo access district.

2 A. Yes.

3 Q. And I guess I'm trying to understand what  
4 you meant by Anglo access district.

5 A. I'm not sure.

6 Q. You would agree that plaintiffs' map 4 for  
7 District 2 has a higher white voting age population  
8 and a higher white citizen voting age population  
9 than either the enjoined plan -- the 2022 plan or  
10 the 2023 plan?

11 A. Yes.

12 Q. Were you trying to propose a white  
13 district by doing it that way?

14 A. No.

15 Q. In drawing your maps, is there a reason  
16 why you kept a coastal district?

17 MR. WARREN: Object to form.

18 A. In which map? I'm sorry?

19 Q. In all of your maps, Plaintiffs' map 1,  
20 plaintiffs' map 2, plaintiffs' map 3, plaintiffs'  
21 map 4, District 2 is what I would characterize as  
22 the coastal district. Is that fair?

23 A. There are others that are -- like map 1  
24 has three districts that are on the coast so I'm not  
25 sure.

1           Q.    But certainly for maps 2, 3, and 4, the  
2    bulk of the districts is a narrow district that hugs  
3    the coast. Correct?

4           A.    Yeah. To an extent.

5           Q.    So my question is, at least in regards to  
6    maps 2, 3, and 4, then, what was the purpose of  
7    keeping the coastal district?

8           A.    To preserve communities of interest within  
9    there.

10          Q.    When you're drawing a coastal district to  
11    preserve communities of interest, that's not taking  
12    into account race, is it?

13          A.    No. I would say that it's about  
14    neighborhoods staying together as well as -- like,  
15    communities by the coast are experiencing some other  
16    issues from a geoconflict standpoint.

17          Q.    When you say similar issues, what type of  
18    issues?

19          A.    Flooding, maybe, as an example.

20          Q.    Okay. Flooding sea level rise, would that  
21    be an issue?

22          A.    I would say it's, yeah, an example of an  
23    issue.

24          Q.    And both plaintiffs' maps 2, 3, and 4, and  
25    the 2022 plan and the 2023 plan all have a coastal

1 district that generally keeps those communities of  
2 interest whole. Correct?

3 A. Could you repeat that one more time?

4 Q. Sure. Plaintiffs' maps 2, 3, and 4, and  
5 the 2022 plan, and the 2023 plan, all have a coastal  
6 district. Correct?

7 A. Yes.

11 MR. WARREN: Okay. Don't push too  
12 hard.

13 (Recess in proceedings.)

14 BY MR. LEVESQUE:

15 Q. Ms. Valdes, I'm going to provide you one  
16 more document. We're going to refer to this document  
17 as DE 24-41.

18 Do you recognize that document?

19 A. Yes.

20 (Defendant's Exhibit 24-41, Declaration, was  
21 marked for Identification.)

22 Q. Did you write this document?

23                   A.     I don't remember to what degree. I know  
24                   the legal team --

25 Q. And I don't want to know about any of your

1 conversations with your legal team, but did you  
2 discuss this with anybody other than your legal  
3 team?

4 A. No.

5 Q. Now, in paragraph 4 you say, I care deeply  
6 about my community and I want what is best for the  
7 community of Miami. What is best for the community  
8 of Miami?

9 A. In regards to the district maps, I would  
10 say it's having representation that is based on the  
11 issues and makeup of a community. I would say  
12 representation that is actually going to address the  
13 issues that folks in different neighborhoods  
14 experience. That's one part of what would be best  
15 for the community. There is a lot of things.

16 Q. You also testify in this declaration that,  
17 I'm politically engaged and plan to continue being  
18 politically engaged in the future. Is that true even  
19 under the 2023 plan?

20 A. Yes.

21 Q. There is nothing about the city's  
22 redistricting plans, whether the first one or the  
23 second one, that you're going to stop being  
24 politically engaged as a result of what the city  
25 does, is there?

1           A. No. I will continue to be politically  
2           engaged regardless.

3           Q. In paragraph 5 you say that the process of  
4           creating a map should have been fair including to  
5           Hispanic residents of Miami. How is it unfair to  
6           Hispanic residents of Miami?

7           A. Drawing maps that are based on the ethnic  
8           background of someone and moving them around based  
9           on that. And also not having deeper community  
10           engagement around it.

11           Q. Now, you're Latina. You're in District 2.  
12           Under the 2023 plan, you're still in District 2.

13           A. Yes.

14           Q. So you would agree that you haven't been  
15           moved.

16           A. Now. In this new map. Yes. I -- I am back  
17           in the original district that I was in.

18           Q. Well, this declaration was addressing the  
19           2022 plan. Now under the 2023 plan you haven't been  
20           moved at all.

21           A. Yeah. Technically speaking. Right.

22           Q. Do you feel that you were kept in your  
23           district because you were Hispanic?

24           A. Potentially.

25           Q. When you say potentially, what do you base

1 that on?

2 A. I don't know what the specific reasoning  
3 was for the city to have shifted that in this newer  
4 map from this year. But it could be a reason.

5 Q. And, again, you don't have a problem being  
6 in District 2, do you?

7 A. I don't.

8 Q. And District 2 currently has a Hispanic  
9 Latina as its commissioner. Correct?

10 A. Correct.

11 Q. And under the plaintiffs' plans some of  
12 them placed you in District 5 that has a Black  
13 commissioner. Correct?

14 A. Correct.

15 Q. And you don't have a problem being  
16 represented by a Black commissioner, do you?

17 A. I do not.

18 Q. And then at least one of the plaintiffs'  
19 plans have you in a Hispanic district that is  
20 different than the District 2, District 1. You  
21 don't have a problem being represented by a  
22 representative in District 1, do you?

23 A. I do not.

24 Q. And when I say a representative of  
25 District 1 I'm referring to a representative that

1 would be elected from plaintiffs' plan 1. Correct?

2 A. Correct.

3 Q. So I guess with that background, what  
4 exactly is your objection to being represented by a  
5 Black commissioner in District 5 --

6 MR. WARREN: Object to form.

7 Q. -- in the 2022 plan?

8 A. It's not just about my particular  
9 location, but that of the makeup of the entire  
10 district.

11 Q. And is it your understanding that nobody  
12 else in District 5 has issues like you have?

13 A. What do you mean?

14 Q. Well, I guess -- explain to me what you  
15 were talking about where you were referencing the  
16 makeup of District 5.

17 A. Which map are we talking about right now?

18 Q. We'll talk about the 2022 enacted plan  
19 where you were drawn into District 5.

20 A. Okay. Got it.

21 Q. This declaration is addressing --

22 A. Right.

23 Q. -- District 5 in that plan.

24 A. Right.

25 Q. So I'm trying to understand what the

1       concerns you would have with being in District 5 in  
2       that map. So with that as the backdrop, when you  
3       reference the makeup of District 5, and your  
4       objection, can you explain that?

5           A. Yeah. I don't think that the way that this  
6       was drawn is representative of the neighborhood. As  
7       you see I'm like right on the border. And, yeah;  
8       I'm not sure.

9           Q. We're looking at the 2022 enacted plan.  
10       Actually, if I could just peek at your 2022 enacted  
11       plan and see one more time. When we look at the 2022  
12       enacted plan you are just to the north of the little  
13       green jut that the map drawers refer to as condo  
14       canyon where District 2 juts into District 5.

15           A. Yes. I'm north of that.

16           Q. And so is it your testimony that the  
17       people south of you and the people north of you  
18       don't have anything in common with the rest of  
19       District 5?

20           A. No. Not necessarily.

21           Q. Then, I guess, what's -- what is your  
22       objection to those neighborhoods being included in  
23       District 5?

24                    MR. WARREN: Object to form.

25           A. I don't remember exactly.

1           Q. You would agree that moving you into  
2 District 5 doesn't make it a Blacker district.  
3 Correct?

4           A. Correct.

5           Q. And, again, you've got no concerns being  
6 represented by a Black commissioner. Correct?

7           A. I do not.

8           Q. In paragraph 6 you say, I am concerned  
9 that Hispanic residents like me have been  
10 artificially stripped from my district on the basis  
11 of our race.

12           You used the term concerned there. Do you  
13 know that to be a fact, that you were artificially  
14 stripped from your district on the basis of your  
15 race?

16           A. No. I don't know that as a fact.

17           Q. Do you believe that actually to be the  
18 case?

19           A. I do believe that. Yes.

20           Q. Okay. What's your basis for believing that  
21 you were artificially stripped from your district in  
22 the 2022 plan?

23           A. I attended a lot of the meetings -- the  
24 commission meetings, and there was an emphasis on  
25 District 2 being more of a white non-Hispanic

1 district.

2 Q. And we looked at some of the numbers  
3 before, but you'll recall that plaintiffs' plan 4  
4 draws a whiter district than either of the two  
5 plans?

6 A. Yes.

7 Q. And so with that background, do you still  
8 believe that you were stripped from the district to  
9 make it whiter?

10 A. I'm not sure.

11 Q. And you recognize that even under the 2022  
12 plan, that elected Hispanic commissioner -- given  
13 that elected Hispanic commissioner, do you believe  
14 it's still a Black district?

15 A. I'm not sure.

16 Q. In paragraph 7, you state, I'm also  
17 concerned that the commission map splits my  
18 neighborhood into several districts with slices  
19 going to Districts 1, 2, and 5. Again you used the  
20 term concerned. How did you mean to use that term in  
21 that sentence?

22 A. Yeah. I think not fully understanding the  
23 implications that it would have in terms of  
24 representation in my neighborhood.

25 Q. But you agree that regardless of whether

1 you were in 1, 2, and 5 in some of the plans that we  
2 discussed, you still would feel comfortable being  
3 represented by a Hispanic commissioner from  
4 District 1, a Hispanic commissioner from District 2,  
5 and a Black commissioner from District 5. Correct?

6 A. Correct.

7 Q. In the last sentence there you state, I am  
8 worried that this division in my district shape are  
9 largely because the commission wanted the districts  
10 to have certain racial demographics and did not draw  
11 the map to best serve our neighborhood or to provide  
12 representation.

13 What did you mean by that statement?

14 A. It's what I gathered from a lot of their  
15 conversations that were had at those meetings.

16 Q. And in that regard, when you're referring  
17 to the conversations at the commission meetings, are  
18 you referring to the commissioners that were  
19 discussing in general terms three Hispanic  
20 districts, a Black district, and what they  
21 frequently referred to as an Anglo district, less  
22 frequently as a coastal district? Is that what you  
23 are referring to?

24 A. I believe so. I don't remember the exact  
25 language, but --

1           Q.    But you would at least agree that in every  
2       single map that we've discussed today, the three  
3       Hispanic districts, a Black district, and a  
4       plurality district that was discussed. Correct?

5           A.    Yes.

6           Q.    And in that polarity district, which race  
7       or ethnicity is predominant? Not a majority, but  
8       predominant in all the plans?

9                    MR. WARREN: Object to form.

10          A.    For District 2?

11          Q.    Uh-huh.

12          A.    The predominant is Hispanic.

13          Q.    In the last paragraph you say, I am  
14       concerned Miami residents are not fairly represented  
15       as a way of the commission drew its map, including  
16       District 5.

17                   When you say concerned, what do you mean  
18       by concerned there in that sentence?

19          A.    I mean that I'm worried that the maps  
20       drawn by the city, and in this point, right, the  
21       2022 map, was not representative for reasons beyond  
22       just my particular residence based on the ways in  
23       which this was presented to the community.

24          Q.    With regard to any of the changes that  
25       were made in the 2023 plan, as it relates to you --

1 not the map broadly, but as it relates to you and  
2 your district, were there changes that were made  
3 that you feel that you are not fairly represented  
4 now?

5 A. I'm not sure.

6 Q. Why aren't you sure?

7 A. Is there a different way you can ask the  
8 question?

9 Q. Well, I guess I look at it as you asserted  
10 that you're a Latina Cuban-American and you are  
11 drawn in a district that Hispanics will make up a  
12 larger percentage of the population than all of the  
13 other races and ethnicities. Do you still have a  
14 concern with representation given you've already  
15 testified that you don't have a problem being  
16 represented by a Black commissioner or a Hispanic  
17 commissioner?

18 A. Yeah. From a personal standpoint, I would  
19 say I don't think I have an issue. Yeah. But I'm not  
20 really sure how to answer that, to be honest.

21 MR. LEVESQUE: No further questions.

22 CROSS-EXAMINATION

23 BY MR. WARREN:

24 Q. Ms. Valdes, earlier you were asked if you  
25 had no problem with being represented by a Black

1 commissioner. Do you remember that?

2 A. Yes.

3 Q. And I believe you may have said you do. Do  
4 you remember that?

5 A. No.

6 Q. Just to clarify, because I think you  
7 answered a negative question with a positive --

8 A. Okay.

9 Q. -- do you have a problem with being  
10 represented by a Black commissioner?

11 A. I do not.

12 Q. Okay. And one more question. Do you have a  
13 concern with the way the city commission drew the  
14 maps that they drew?

15 A. Yes.

16 Q. What is your main concern with the way the  
17 city commission drew the maps that they drew?

18 A. That it was based on people's race and not  
19 necessarily communities of interest and neighborhood  
20 makeup.

21 MR. TILLEY: No more questions.

22 REDIRECT EXAMINATION

23 BY MR. LEVESQUE:

24 Q. Related to the last question that counsel  
25 asked you, related to you in your district and then

1       we talked about the map and we talked about your  
2       district, if I understood your prior testimony,  
3       there is nothing that you can point to related to  
4       you and your district that would indicate that you  
5       were placed in your district because of your race.  
6       Correct?

7           A.    I'm not sure. I think given, like, how my  
8       residence falls on the border in several of the  
9       maps. So, again, it's a broader concern about how it  
10      was drawn in addition to having been moved out of my  
11      original district with the map from 2022.

12          Q.    If I could pause for one moment and ask if  
13      I can look at your maps.

14          A.    Yeah. All of them or --

15          Q.    Yeah. Okay. And, again, in the 2023  
16      enacted plan you were a Latina that is drawn into a  
17      polarity district and you don't have a problem being  
18      in that plurality district. Correct?

19          A.    I do not have a problem.

20                    MR. JOHNSON: No further questions.

21                    MR. TILLEY: We'll read.

22                    THE COURT REPORTER: Do you need it  
23      typed up?

24                    MR. LEVESQUE: Yeah.

25                    MR. TILLEY: Yes. Copy of both.

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1

2 (Thereupon, the taking of the deposition was  
3 concluded at 3:40 p.m.)

4 (Signature and formalities were not waived.)

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1 RE: Grace, Inc., et al v. City of Miami  
2 DEPO OF: Yanelis Valdes  
3 TAKEN: Wednesday, October 4th, 2023

4 EXCEPT FOR ANY CORRECTIONS  
5 MADE ON THE ERRATA SHEET BY  
6 ME, I CERTIFY THIS IS A TRUE  
7 AND ACCURATE TRANSCRIPT.  
8 FURTHER DEPONENT SAYETH NOT.

9 STATE OF FLORIDA )  
10 COUNTY OF MIAMI DADE )  
11  
12 Sworn and subscribed to before me this  
13 day of \_\_\_\_\_, 20\_\_\_\_.  
14 PERSONALLY KNOWN \_\_\_\_\_ OR ID. \_\_\_\_\_

15 \_\_\_\_\_ Notary Public in and for  
16 the State of Florida at  
17 Large.  
18 My commission expires:  
19  
20  
21  
22  
23  
24  
25

1 ERRATA SHEET

2 IN RE: Grace, Inc., et al v. City of Miami

3 DEPOSITION OF: Yanelis Valdes

4 TAKEN: Wednesday, October 4th, 2023

5 DO NOT WRITE ON TRANSCRIPT - ENTER ANY CHANGES HERE

6 Page # Line # Change Reason

7 \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

8 \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

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20 \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

21 State of Florida:

22 County of \_\_\_\_\_ :

23 Under penalties of perjury, I declare that I have  
24 read my deposition transcript, and it is true and  
correct subject to any changes in form or substance  
entered here.

25 \_\_\_\_\_

YANELIS VALDES

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1 CERTIFICATE OF OATH  
2

3 STATE OF FLORIDA )  
4 COUNTY OF MIAMI-DADE )  
5

6 I, Mayra Texeira, Court Reporter and Notary  
7 Public in and for the State of Florida at Large,  
8 certify that the witness, YANELIS VALDES, personally  
9 appeared before me on October 4th, 2023 and was duly  
10 sworn by me.

11  
12 Signed this 18th day of October, 2023.  
13  
14  
15  
16

17 

18  
19 MAYRA TEXEIRA, Court Reporter  
20 Notary Public - State of Florida  
21 COMMISSION NO. HH 12099  
22 EXPIRES JUNE 26, 2024  
23  
24  
25

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1 CERTIFICATE OF REPORTER

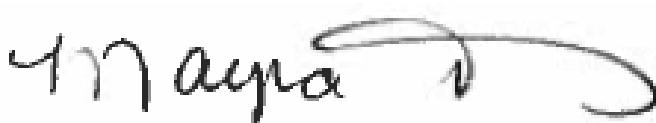
2 STATE OF FLORIDA )

3 COUNTY OF MIAMI-DADE )

4 I, MAYRA TEXEIRA, Court Reporter, do hereby  
5 certify that I was authorized to and did  
6 stenographically report the deposition of  
7 YANELIS VALDES; that a review of the transcript was  
8 not waived; and that the foregoing transcript,  
9 pages 1 through 69, is a true and complete record of  
10 my stenographic notes.

11 I FURTHER CERTIFY that I am not a relative,  
12 employee, attorney or counsel of any of the parties,  
13 nor am I a relative or employee of any of the  
14 parties' attorney or counsel connected with the  
15 action, nor am I financially interested in the  
16 action.

17 Dated this 18th day of October, 2023.

18  
19   
20

21 MAYRA TEXEIRA, Court Reporter

Page 75

1 Daniel Tilley, Esquire

2 dtilley@acclufl.org

3 October 18th, 2023

4 RE: Grace, Inc. Et Al. v. City of Miami

5 10/4/2023 - Yanelis Valdes- Job# 6121370

6 The above-referenced transcript is available for  
7 review.

8 Yanelis Valdeshould read the testimony to  
9 verify its accuracy. If there are any changes,  
10 Yanelis Valdes should note those with the reason  
11 on the attached Errata Sheet.

12 Yanelis Valdes should, please, date and sign the  
13 Errata Sheet and email to the deposing attorney as well as  
14 to Veritext at Transcripts-fl@veritext.com and copies will  
15 be emailed to all ordering parties.

16 It is suggested that the completed errata be returned 30  
17 days from receipt of testimony, as considered reasonable  
18 under Federal rules\*, however, there is no Florida statute  
19 to this regard.

20 If the witness fails to do so, the transcript may be used  
21 as if signed.

22 Yours,

23 Veritext Legal Solutions

24

25 \*Federal Civil Procedure Rule 30(e)/Florida Civil Procedure  
Rule 1.310(e).

[1 - 4]

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FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under rule 1.330(d)(4).

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